

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
Northern Division**

GREAT LAKES EXPLORATION )  
GROUP LLC )  
Plaintiff, )  
v. ) Civil Action No. 1:04-CV-375  
The Unidentified, Wrecked and (For Salvage- ) HON. ROBERT HOLMES BELL  
Right Purposes), Abandoned Sailing Vessel, etc. )  
Defendant, et al. )

**PLAINTIFF GREAT LAKES EXPLORATION'S NOTICE OF  
ADDITIONAL AUTHORITY**

Plaintiff Great Lakes Exploration, LLC respectfully invites the Court's attention to the following additional authority, which was inadvertently omitted from Plaintiff's Memorandum in Opposition dated June 26, 2006:

*R.M.S. Titanic v. the Wrecked and Abandoned Vessel,*  
435 F.3d 521 (4<sup>th</sup> Cir. 2006).

The recent authority from the U.S. Court of Appeals for the Fourth Circuit addresses the procedure for awarding salvor-in-possession status to a salvor who has agreed to act as a trustee for the public's interest in the scientific, historic and archaeological values of an historic shipwreck. *See R.M.S. Titanic*, 435 F.3d .at 537 ("the court may appoint the plaintiff to serve as salvor to further the public interest in the wreck's historical, archeological, or cultural aspects and to protect the site through injunctive relief, installing the salvor as its exclusive trustee so long as the salvor continues the operation. The court may, in addition to the traditional salvage remedies, also enter such orders as to the title and use of the property retrieved as will promote the historical, archeological, and cultural purposes of the salvage operation.")

Respectfully submitted,

GREAT LAKES EXPLORATION

/s/ Richard T. Robol

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of July, 2006, a copy of the foregoing was served by electronic mail via the Court's ECF system upon all counsel of record.

/s/ Richard T. Robol

Of Counsel